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*Attorneys for Defendants Wells Fargo Bank, N.A. and Katherine Darrall*

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

ANDREW D. ZARON, solely in his capacity as  
 the Court-Appointed Receiver of JAMA  
 INVESTMENT GROUP, INC., MAURICIO  
 JASSO, GUILLERMO SESMA, SYLVIA  
 MARTINEZ SALINAS, BELISARIO JASSO  
 BALDINI, JAVIER RAMIREZ LARES,  
 ANTONIO BACHALANI, RODRIGO  
 FERNANDEZ, JUAN ROMERO and  
 BERNARDO VILLACECIAS,

Plaintiffs

v.

WELLS FARGO BANK, N.A., KATHERINE  
 DARRALL, and JOSE RICO,

Defendants

Case No. 2:20-cv-00858-CDS-BNW

**STIPULATION AND ORDER FOR  
 EXTENSION OF TIME TO FILE  
 JOINT MOTION TO SEAL, ALL  
 EXHIBITS TO PLAINTIFFS'  
 DISPOSITIVE MOTION BRIEFING,  
 UNDER SEAL PORTIONS OF  
 PARTIES' SUMMARY JUDGMENT  
 BRIEFING AND JOINDERS BY ONE  
 DAY**

**[SECOND REQUEST]**

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Local Rule IA 6-1, Plaintiffs and  
 Defendants, for good cause, hereby stipulate and agree to extend the deadline for the Parties to re-  
 file the under seal portions of their summary judgment briefs, Plaintiffs' exhibits to their dispositive  
 motion briefing (as directed by the Court (*see* ECF 457)),<sup>1</sup> and the parties' Joint Motion to Seal  
 ("Joint Motion"), and the exhibits thereto, and previously filed joinders from January 24, 2024 to

<sup>1</sup> All of the public versions of the Parties' respective summary judgment motions, responses, and replies, as well as the Defendants' exhibits, will be filed by the January 24, 2024 deadline.

1 January 25 2024, and state as follows:

2 1. On December 18, 2023, the Court held a hearing, during which the Court directed  
3 the parties to re-file their summary judgment motions (without substantive changes) and exhibits  
4 thereto, together with a new motion to seal and redact pertinent materials, by January 17, 2024. *See*  
5 ECF 457.

6 2. The Court's Minute Entry states, "If parties need additional time, they may file a  
7 stipulation for additional time." *See* ECF 457.

8 3. The Court once extended the deadline by one week, to January 24, 2024. *See* ECF  
9 459 (granting Stipulation at ECF 458).

10 4. The Parties have been working diligently to file their papers by January 24, 2024,  
11 and the Parties plan to have their public version of the briefings filed.. This process took substantial  
12 time due to the number of documents and issues involved, as well as the Parties in good faith  
13 adapting their positions during the meet-and-confer process, which ultimately has resulted in much  
14 more of the materials at issue being filed in the public record (some of which was resolved as  
15 recently as today)and minimizing the material proposed to be sealed. Moreover, as filings were  
16 being finalized, there was some miscommunication as to which party was filing which documents  
17 because the parties have agreed to submit a joint motion to file certain documents under seal, as  
18 well as the chronological order of document filing, which has unfortunately made it impracticable  
19 for the exhibits to Plaintiffs' filings and the sealed and redacted exhibits to the Joint Motion to be  
20 submitted by the January 24, 2024 deadline.

21 5. The Parties submit this request is not for the purpose of delay and that it is consistent  
22 with the purposes stated in Rule 1, Federal Rules of Civil Procedure.

23 6. In light of the above, the Parties respectfully stipulate and request that the deadline  
24 to file the under seal portions of their summary judgment briefs and the briefs' exhibits (as directed  
25 by the Court (*see* ECF 457)), all exhibits to Plaintiffs' dispositive motions briefing and the parties'  
26 Joint Motion to Seal, the exhibits thereto, and previously filed joinders be extended from January  
27 24, 2024 to January 25, 2024.  
28

DATED this 24<sup>th</sup> day of January, 2024.

SNELL & WILMER L.L.P.

/s/ Jacob C. Jones

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DATED this 24<sup>th</sup> day of January, 2024

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/s/ Colleen E. McCarty (with permission)

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DATED this 24<sup>th</sup> day of January, 2024.

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*Attorneys for Plaintiffs*

IT IS SO ORDERED.

  
UNITED STATES DISTRICT JUDGE

DATED: January 26, 2024